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BEFORE THE ARIZONA CORPORATION COMMISSION

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ARIZONA CORPORATION COMMISSION
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DOCKET NO. E-20690A-09-0346

IN THE MATTER OF THE APPLICATION OF
THE APPLICATION OF SOLARCITY FOR A
DETERMINATION THAT WHEN IT PROVIDES
SOLAR SERVICE TO ARIZONA SCHOOLS,
GOVERNMENTS, AND NON-PROFIT
ENTITIES IT IS NOT ACTING AS PUBLIC
SERVICE CORPORATION PURSUANT TO
ART. 15, SECTION 2 OF THE ARIZONA
CONSTITUTION

**SALT RIVER PROJECT
AGRICULTURAL
IMPROVEMENT AND POWER
DISTRICT'S CLOSING BRIEF**

In its opening brief, Salt River Project cautioned against making a significant change in Arizona utility law because of a current desire to promote a particular solar business model. The "SSA" structure is simply an ephemeral reaction to a current tax structure and incentive model. It would be a mistake for the Commission to ignore the Constitution for this circumstance, given the potential known and unknown long-term implications. The better approach is for the Commission to exercise its jurisdiction, in an appropriate manner, to support the development of solar businesses and protect consumers.

After several days of hearings and written briefs from the parties, Article 15, Section 2 of the Constitution remains clear – "All corporations other than municipal engaged in furnishing ... electricity for light ... shall be deemed public service corporations." Artful contract drafting or strained interpretations of words cannot change that conclusion.

In their opening briefs, the parties were split on these issues. Several parties agreed with the Commission Staff's position. Others, although agreeing that SolarCity is a public service corporation, decided not to take a position on

1 whether or to what extent the Commission should exercise its jurisdiction in this
2 case.

3 SolarCity and other parties made various arguments, mostly relying on
4 the factors set forth in the *Serv-Yu* case (even though this case was never
5 intended to set forth a general test). This brief will respond to those
6 arguments.

7 **RESPONSE TO OPENING BRIEFS**

8 While some of the parties structured their responses in accordance with
9 the factors listed in the *Serv-Yu* case, it is more instructive to break the
10 arguments out in a more structured way—first, determine whether SolarCity
11 meets the Constitutional definition of public service corporation, second,
12 address arguments that suggest that the Commission should not exercise
13 jurisdiction, and finally, discuss how *Serv-Yu* relates to this case.

14 **A. *SolarCity is a Public Service Corporation***

15 In its opening brief, SRP discussed the historic backdrop of Article 15 of
16 the Arizona Constitution. The thrust of the Constitution, and related statutory
17 provisions, was to protect the public with respect to the provision of services
18 that were deemed to be of particular public benefit, such as the provision of
19 water, electricity, natural gas, oil, telephone and transportation services. It is
20 quite clear, placing the constitutional provision in context, that the definitions of
21 public services were meant to be read broadly with the intent of protecting the
22 citizens of the State.

23 The arguments of the no-regulation advocates follow a similar theme.
24 Their first argument is that SolarCity is not “furnishing” electricity, and is
25 therefore not within the scope of the Constitutional definition. They cite only
26 one case, *Williams v. Pipe Trades Industry Program of Arizona*, 100 Ariz. 14,
27 409 P.2d 720 (1966) for the proposition that the term “furnishing” means a
28 transfer of possession. As SolarCity claims to never take title to the electricity,

1 they argue that it is not "furnishing" electricity.

2 Putting aside the obvious point that the structure of the SolarCity
3 agreements should not solely dictate the classification of the company, their
4 argument is not even supported by the one case cited in support. In *Williams*,
5 the court was faced with an argument that a company providing hot water for
6 heating was "furnishing" water under the constitution. The court noted that the
7 customer never receives the water, as it simply circulates in the pipes. The
8 point of the decision was that the customer did not receive water; there was no
9 "transfer of possession", in the parlance dictated by the facts of this case.

10 Here, of course, the customer receives and uses electricity generated
11 from solar generators owned by SolarCity. It is the receipt and use of the
12 product that was the basis of the *Williams* decision. *Williams* in no sense stands
13 for the proposition that the owner of an electric generator providing electricity
14 to a customer can escape regulation simply through the device of claiming not
15 to take title to the output that is provided to the customer.

16 The corollaries to this strained interpretation are obvious. A water utility
17 might claim that it is just providing pumps, wells and pipes, and never takes
18 title to the water. An electric generator could sell undivided shares in the
19 output of a generating facility, thus not taking title to the electricity. A
20 telecommunications company might provide the use of the infrastructure,
21 leaving the customer to provide the signals.

22 In its brief, RUCO claims that SolarCity is simply a financier, it is not
23 furnishing electricity to anyone (RUCO's Closing Brief dated December 15,
24 2009, p.4, II.4-11) ("RUCO Brief"). It is difficult to follow this argument, as the
25 practical effect of SolarCity's ownership and operation of distributed generating
26 facilities is that the customer receives and uses electricity. There are few
27 utilities of any type that do not engage in financing the facilities that provide
28 services to customers. In this respect SolarCity is no different from any utility.

1 There is little question that SolarCity is furnishing electricity within the
2 meaning of the Constitution.

3 ***B. The Second "Prong" of the Test Does Not Exempt SolarCity***

4 Under the case law, it is certain that there is a second level of analysis,
5 or a second prong of the test, to determine whether a business is subject to
6 Commission oversight. The question in this docket is the breath of this second
7 level of analysis. In its opening brief, SRP pointed out that the application of
8 this second level has been limited to businesses where the constitutionally-
9 listed service was incidental to a different business, for example, trailer park
10 services, alarm services and security services.

11 The case law contains a number of broad statements in *dicta*, which are
12 cited by all of the parties (not excepting SRP) to support various positions.
13 Several of the parties argue for a broad exemption, based on these *dicta*
14 statements. But a careful reading of each of these cases support the common
15 sense proposition that where the primary purpose of a business is to deliver a
16 constitutionally-listed service, no exemption applies.

17 The no-regulation advocates most often cite *Natural Gas Service Co. v.*
18 *Serv-Yu Cooperative, Inc.*, 84 P.U.R.(NS) 148, 70 Ariz. 235, 219 P.2d 324
19 (1950) for the proposition that ACC regulation is not required. As discussed in
20 detail in SRP's opening brief, this case is specific to its facts and, to some
21 extent, is a function of the time in which the decision was written. As discussed
22 below in subpart D(4), when considered in context, the *Serv-Yu* case firmly
23 supports a finding that SolarCity is subject to Commission oversight.

24 The next most cited case probably is *Southwest Transmission*
25 *Cooperative, Inc. v. Arizona Corporation Commission*, 213 Ariz. 427, 142 P.3d
26 1240 (Ariz.App.Div.1 2007). The parties particularly focused on the language of
27 the Court of Appeals decision which describes the second "step" as:
28

1 Second, we evaluate whether the entity's business
2 and activity are such "as to make its rates, charges,
3 and methods of operations a matter of public
concern", by considering the eight factors articulated
in [*Serv-Yu*].

4 213 Ariz. 427, 430, 142 P.3d 1240, 1243

5 But, the facts in *Southwest Transmission* bear no resemblance to the
6 SolarCity circumstances. In *Southwest Transmission Cooperative (SWTC)* (a
7 spinoff company from an integrated and regulated retail electric provider)
8 owned and operated high voltage electric transmission. It had no retail
9 customers. SWTC argued that although the transmission operations were once
10 part of a regulated entity, they were no longer subject to regulation because
11 they were now owned by a separate company that does not "furnish"
12 electricity. The court found that SWTC was furnishing electricity within the
13 meaning of the Constitution, even though SWTC did not own the electricity, did
14 not sell the electricity and did not interact with retail customers. The court
15 reasoned that "[b]y transmitting electricity from a generating entity to the
16 distributors, SWTC is 'furnishing power' to the distributors, which sell the
17 electricity as 'power' to various customers." See *Id.* at 213 Ariz. 427, 431, 142
18 P.3d 1240, 1244.

19 The court went on to consider the *Serv-Yu* factors, again concluding that
20 SWTC was subject to regulation. Though SWTC was not asserting any
21 monopoly rights, the court in substance found that "[i]ts role is integral in
22 providing electricity to the public." See *Id.* at 213 Ariz. 427, 433, 142 P.3d
23 1240, 1246.

24 To even a more significant and direct extent than with SWTC, SolarCity
25 owns the facilities which generate the power which is integral to providing
26 electricity to the public. The *Southwest Transmission* case supports a finding
27 that SolarCity is a public service corporation subject to regulation.
28

1 The no-regulation advocates also cite *Arizona Corporation Commission v.*
2 *Nicholson*, 108 Ariz. 317, 497 P.2d 815 (1972) to support the proposition that
3 there is a presumption against regulation: "free enterprise and competition is
4 the general rule". *Id.* at 321, 497 P.2d 815 819, citing *General Alarm v.*
5 *Underdown* 76 Ariz. 235, 262 P.2d 671 (1953). In *Nicholson*, the owner of a
6 trailer park that provided water service as part of a trailer space rental package
7 was found not to be a public service corporation. The court first noted that it is
8 the "commodity" that establishes the interest of the public: "plaintiffs concede,
9 and there can be no question that the commodity, water in this case, is one of
10 special public interest". *See, Id.* at 108 Ariz. 317, 320, 497 P.2d 815, 818. The
11 court stated generally: "When one devotes his property to a use in which the
12 public has an interest he, in effect, grants to the public an interest in that use,
13 and must submit to control by the public for the common good." But the court
14 found that "the furnishing of water is in support and incidental to plaintiffs'
15 business of renting trailer spaces." *See, Id.* at 108 Ariz. 317, 320, 497 P.2d
16 815, 818.

17 Despite language in *dicta*, the crux of the holding in this case was that
18 the provision of water was incidental to the main business of renting trailer
19 spaces. The court was clear that its general language related to this premise:
20 "It was never contemplated that the definition of public service corporations as
21 defined by our constitution be so elastic as to fan out and include businesses in
22 which the public might be incidentally interested." *See, Id.* at 108 Ariz. 317,
23 321, 497 P.2d 815, 819. While a presumption against regulation may exist,
24 this presumption does not extend to businesses clearly providing electricity as
25 the primary (or in this case only) product of the business.

26 It is surprising to see *Petrolane-Arizona Gas Service v. Arizona Corp.*
27 *Comm'n*, 119 Ariz. 257, 580 P.2d 718, (1978) cited in support of the no
28 regulation advocates' position, because the holding of the case clearly supports

1 Commission oversight here. In *Petrolane*, a distributor of liquid propane gas
2 through a central distribution system argued that it was not subject to
3 regulation as the Constitution did not specify liquid gas as a listed public
4 service, and that this was not the company's primary service. In rejecting that
5 contention, the court found that the fact that the gas delivery was by liquid
6 means did not exempt the company from regulation and that the gas
7 distribution business was not "incidental, but was a distinct part of the
8 company's business. The reasoning of the court is instructive in this case:

9 [T]he purposes of regulation are to preserve and
10 promote those services which are indispensable to
11 large segments of our population, and to prevent
12 excessive and discriminatory rates and inferior
13 service where the nature of the facilities used in
14 providing the service and the disparity in the relative
bargaining power of the utility ratepayer are such as
to prevent the ratepayer from demanding a high
level of service at a fair price without the assistance
of governmental intervention on his behalf.

15 119 Ariz. 257, 259, 580 P.2d 718, 720.

16 *Southwest Gas Corporation v. Arizona Corp. Comm'n*, 169 Ariz. 279, 818
17 P.2d 714 (Ariz.App.Div.1 1991) contains general language regarding the public
18 interest, and is cited by the no-regulation advocates as supporting the
19 proposition that there is no public interest in reviewing the business of
20 SolarCity. But, the facts and findings of this case have no similarity to
21 SolarCity. The court found that El Paso Natural Gas Company, which
22 predominantly operated a wholesale natural gas transport business, was not a
23 public service corporation even though it had ten retail customers. The court
24 based its decision primarily on the fact that one hundred percent of the
25 business was regulated by FERC and that FERC had issued certificates of
26 convenience and necessity for the ten retail customers. The court also noted
27 that El Paso's retail relationships were long standing, and that it was not
28 accepting any new requests for service.

1 **C. *The Public Interest is Served by Commission Oversight***

2 As has been discussed, a business providing electricity provides a public
3 service. The Constitution elevates certain services, including electric service, to
4 a different status because they are services imbued with the public interest.
5 Nonetheless, it has been argued that SolarCity's business is such that
6 regulation is not needed, or that the only level of regulation needed is the
7 general oversight provided by the Registrar of Contractors or the Attorney
8 General.

9 While this argument misses the point, as it is the commodity that
10 dictates the public interest, the argument is simply wrong. There are many
11 aspects of SolarCity's business that in appropriate circumstances would benefit
12 by Commission oversight and consumer protection.

13 For example:

14 1. *Ensure Accurate Cost Comparisons with Current Rates.* As
15 demonstrated by the testimony of David Peterson, Assistant Superintendent for
16 Operations, of Scottsdale Unified School District (more by omission in the
17 testimony) a comparison of costs is very complicated and requires expertise. A
18 comparison would look, for example, at the use on peak and off peak (contrary
19 to popular belief, the majority of the output of a solar photovoltaic system is off
20 peak, when the winter months are included). As indicated by Staff witness
21 Steve Irvine, an actual comparison of cost requires access to and the ability to
22 use complicated formulae. Solar generators will not likely be able to perform
23 this customer-by-customer comparison, leaving to the Commission the
24 oversight responsibility of determining whether sales representations are
25 appropriately informative and accurate.

26 2. *Ensure the Clarity of Pricing Terms.* While the contracts of
27 SolarCity presented to the Commission contemplate a fixed price, this approach
28 is by no means universal. Contracts can contain escalators and adjustment

1 mechanisms. These types of pricing structures have the potential of deception
2 or confusion, an area suited to Commission oversight. Also, full disclosure of
3 the terms of net metering and wholesale buy-back programs by the distribution
4 utility and potential future changes will be very important to the economics to
5 the customer.

6 3. *Ensure the Accuracy of Advertising Statements.* While perhaps not
7 the case with SolarCity, the advertisement and marketing representations
8 regarding distributed solar services have significant potential to create customer
9 confusion, or in the worst case constitute outright misrepresentations. Probably
10 the biggest area of possible issues is in the representations of long term savings
11 (which assumes various levels of electricity price increases).

12 4. *Provide a Forum for Resolution of Disputes.* During the hearing,
13 we learned that the business model of most providers is to form a limited
14 liability company for each installation and then sell that company as a revenue
15 stream to investors. Some providers like SolarCity maintain a managing
16 partner interest in the limited liability company but others sell their ownership
17 interest. In these circumstances, the only recourse for a consumer with a
18 problem is to appeal to these potentially unknown and out of state investors.

19 Clearly, these are similar issues that exist with any electricity provider.
20 The Commission is particularly suited (putting aside that it is constitutionally
21 required) to provide appropriate oversight to customers.

22 ***D. A Reprise on Serv-Yu***

23 SRP has demonstrated that the "Serv-Yu factors" should be used
24 sparingly and carefully, if at all, in determining whether a business is a public
25 service corporation. While there are general *dicta* in a number of Court of
26 Appeals decisions, the actual decisions have focused on a single concept.

27 The concept is that the protection of the Constitution focuses on the
28 service provided, not the structure of the business. Where a business provides

1 one of the listed services, its business is infused with the public interest, and it
2 is said to be providing a public service. Only where the listed service is truly
3 incidental to an unregulated business, have the courts found that the public
4 interest does not require oversight by the Commission.

5 At issue here is SolarCity's business of owning solar generating facilities
6 on customer premises. The business provides a single product, electricity. The
7 analysis can stop there. But, added to this is the fact is the Commission is
8 uniquely suited to oversee the terms and conditions of service, review the
9 pricing and pricing formulas, and ensure consumer protection. This is not a
10 close case.

11 Nonetheless, as every other party has gone through the "factors" in
12 *Serv-Yu*, SRP will do so against the backdrop of the Constitution and the
13 substantive holdings of the case law.

14 The *Serv-Yu* factors:

15 1. *What the corporation actually does.*

16 This factor is consistent with the Constitution. If a corporation provided
17 one of the listed services (e.g. water or electricity) it is providing a public
18 service and is a public service corporation. Unquestionably the sole business of
19 SolarCity is to provide electricity to customers. RUCO claims that this factor is
20 met only where the service is indispensable (RUCO's Brief, p.7, II.3-22). Not
21 only is the statement without support, but it would exempt any utility service
22 being provided in a competitive market.

23 2. *A dedication to public use.*

24 This factor is similar to subparagraph 1 above. The facilities are
25 dedicated to providing a public service to members of the public, electricity.
26 The no-regulation advocates, particularly SunPower (SunPower Initial Post
27 Hearing Brief dated December 15, 2009, p.15, II.20-25, p. 16, II.1-26) claim
28 that this factor contemplates that the electricity is generally available to the

1 public. This argument is inconsistent with the Constitutional approach in
2 Arizona. It is the provision of electricity that is the public use or public service.
3 There is no authority that would suggest that the public service changes if the
4 electricity is provided by distributed generation rather than central station
5 generation.

6 3. *Articles of incorporation, authorization, and purposes.*

7 As discussed in SRP's opening brief, this factor became antiquated upon
8 the adoption of a new corporations code in 1975, as the law no longer required
9 a limited purpose for corporations. Nonetheless, the organizational documents
10 of SolarCity permit the business of a public service corporation.

11 4. *Dealing with the service of a commodity in which the public has*
12 *been generally held to have an interest.*

13 It is difficult to separate this factor from subparagraphs 1 and 2 above,
14 as they all interrelate. Clearly SolarCity's business is to provide electricity to
15 customers, no matter how characterized. RUCO claims that this factor is only
16 triggered where the service uses common facilities. Putting aside the fact that
17 SolarCity's model relies on common facilities both for net metering and to
18 provide firm capacity, there is no authority that would limit regulation to
19 services provided through common facilities.

20 5. *Monopolizing or intending to monopolize the territory with a public*
21 *service commodity.*

22 This factor is inconsistent with the Constitution and has been rejected by
23 subsequent court decisions. As SRP points out in its opening brief, the concept
24 of whether a business is a monopoly played no part in the development of
25 Article 15. The point was whether the business provided an essential "public
26 service". Thus the Constitution included many classes of businesses that did
27 not enjoy monopoly status, then or now:

28 Corporations . . . engaged in carrying persons or
property for hire; or in furnishing gas, oil, or

1 electricity for light, fuel, or power; or in furnishing
2 water for irrigation, fire protection, or other public
3 purposes; or in furnishing, for profit, hot or cold air
4 or steam for heating or cooling purposes; or in
5 transmitting messages or furnishing public telegraph
6 or telephone service, and all corporations . . .
7 operating as common carriers, shall be deemed
8 public service corporations.

9 The only support for this proposition is the general language in the *Serv-*
10 *Yu* case. As pointed out in SRP's opening brief, *Serv-Yu's* eight factors are
11 particular to its facts and the company at issue. There were additional facts
12 from the particular record listed by the court on rehearing to support its original
13 determination that *Serv-Yu* was a public service corporation. It was not
14 intended to nor should it be extrapolated into a general test.

15 The argument that non-monopolies should be exempted from regulation
16 would not have made sense in 1912, and it would make even less sense now.
17 Today, most businesses providing a commodity listed in the Constitution are
18 competitive to one degree or another. Certainly, most if not all of the
19 telecommunications industry is competitive; its participants are not monopoly
20 providers. And it might be argued that natural gas service is subject to a
21 myriad of competitors providing alternative energy services (e.g. electricity and
22 propane). A broad extrapolation of the argument made here would exempt
23 almost all of the utilities regulated by the Commission, save perhaps water and
24 sewer utilities.

25 6. *Acceptance of substantially all requests for service.*

26 To the extent that this is a consideration, the record shows that SolarCity
27 accepts all requests for service by customers meeting its standards. (Exhibit A-
28 5, p.8, ll.12-28, p.9, ll.1-7).

1 7. *Service under contracts and reserving the right to discriminate is*
2 *not always controlling.*

3 This factor does not apply here, except to say that SolarCity does provide
4 service under contract and assumedly intends to discriminate from customer to
5 customer.

6 8. *Actual or potential competition with other corporations whose*
7 *business is clothed with public interest.*

8 This factor seems inconsistent with the breadth of the Constitution.
9 Nonetheless, the electricity service provided by SolarCity is directly competitive
10 with energy sales by the incumbent distribution utility. SolarCity argues that it
11 is not, as the utilities must meet renewable standards. (SolarCity's Initial Post-
12 Hearing Brief dated December 15, 2009, p. 15, ll.11-16) ("SolarCity Brief") But
13 once again this is a function of this particular point in time, and cannot be said
14 to be universally true for any type of distributed generation at any time.

15 We have pointed out that the eight factors of *Serv-Yu* are merely guides
16 for analysis, they need not be found to exist for a company to be a public
17 service corporation. *Petrolane-Arizona Gas Serv. v. Arizona Corp. Comm'n*, 119
18 Ariz. at 259, 580 P.2d at 720. But, even if we follow the *Serv-Yu* eight factors,
19 the conclusion is clear: put in the context of history and case law *Serv-Yu*
20 supports the proposition that the business of SolarCity falls squarely within the
21 scope of Commission oversight. In the ultimate analysis it is the language of
22 the Constitution that controls:

23 However we do not rely entirely upon the reasons set
24 forth in . . . [*Serv-Yu*] for our conclusion in this
25 case. The language of the Constitution is too clear to
 admit of any other interpretation than that reached
 under the facts of this case.

26 *Trico Electric Cooperative v. Corporation Commission*, 86 Ariz. 27, 33-34, 339
27 P.2d 1046, 1050-51 (1959)

CONCLUSION

The approach of SolarCity is to tell the Commission that to regulate means to kill the development of solar power. For example, on page 1 of its opening brief SolarCity states: "Regulating the providers of Solar Service Agreements . . . will drive tax equity investors away from Arizona and into the numerous other unregulated markets around the Country. . . . Decide not to regulate - like every other State that has faced this question - and watch the tax equity investment pour into Arizona. . . ."¹

But, current circumstances make these statements hard to believe. In September of 2009 the Commission established a relatively easy and streamlined process for approving solar services contracts. At that time it was projected (in the Solar Alliance docket, Docket No. E-20633A-08-0513) that the Commission would be flooded with applications. (Transcript of Proceedings, June 22, 2009, p. 91, ll. 15-17) It was said that solar contracts must be executed before year-end. Yet other than the applications for the two high school installations that are part of this docket, there has not been a single request for approval of a solar services agreement.

This factor alone demonstrates that it is not the Commission that is standing in the way of a "flood" of SSA transactions. The Commission has and can establish effective and inexpensive methods of oversight. So long as there were no problems requiring Commission intervention, solar providers would be inconvenienced little. SolarCity claims that any regulation at all will destroy the solar industry (SolarCity Brief, p. 24, ll.1-23). But, just like the business licenses, procurement policies and building permits that the industry seems to

¹ In its opening brief, page 1, RUCO appears to support this all or nothing approach: "There is a lot at stake in this case - perhaps the future development of the solar industry in Arizona. (RUCO Brief, p.1, ll.20-21) . . . The evidence in this record is clear - a determination to regulate, even in its lightest form, will hinder the growth of the solar industry in Arizona." (RUCO Brief, p. 2, ll.18-20)

1 accept, SolarCity and the rest of the industry will adapt to reasonable oversight
2 by the Commission.

3 SRP suggests that the Commission should not succumb to scare tactics.
4 The precedents that would be set by granting SolarCity's application will have
5 long reaching effects on the regulations of utilities in Arizona. The Commission
6 should exercise its constitutional jurisdiction to support the solar industry while
7 protecting customers against possible abuses.

8 DATED this 15th day of January, 2010.

9 JENNINGS, STROUSS & SALMON, P.L.C.

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